

E-filed 2/23/07

JOHN M. SKONBERG, Bar No. 069409
 RONALD D. ARENA, Bar No. 218421
 LITTLER MENDELSON
 A Professional Corporation
 650 California Street, 20th Floor
 San Francisco, CA 94108.2693
 Telephone: 415.433.1940
 Facsimile: 415.399.8490
 Email: rarena@littler.com

Attorneys for Plaintiff
 AMERICAN MEDICAL SYSTEMS, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

AMERICAN MEDICAL SYSTEMS,
 INC.,

Plaintiff,

v.

ALLAN DANTO, DANTO &
 ASSOCIATES, and DOES 1-100
 inclusive,

Defendants.

Case No. C06-07083 JF

**STIPULATION AND [PROPOSED]
 ORDER**

Complaint Filed: November 16, 2006
 Trial date: None set

The parties to the above captioned action, by and through their attorneys, hereby stipulate and agree as follows:

1. The parties to the above-captioned lawsuit have recently finalized the terms of a settlement in the above-referenced matter, though the settlement agreement has not been signed and the terms of the settlement agreement have not yet been fulfilled. As part of the settlement, the materials identified in the Complaint will be destroyed and/or erased by a neutral expert to be agreed-upon by the parties. In lieu of filing a case management conference statement, the parties respectfully request that the case management conference (currently scheduled for February 23, 2007), and all associated deadlines, be continued for 60 days to give the parties an opportunity to finalize the settlement agreement and to satisfy the terms of the settlement agreement.

1 2. Moreover, the parties respectfully request that, until the terms of the
2 settlement have been fulfilled and the case is dismissed, the Court retain jurisdiction over the matter
3 to resolve any disputes which may arise in connection with the settlement and resolution of this
4 matter.

 The Case Management Conference is continued to 4/27/07 at 10:30.

 SO STIPULATED:

6 Dated: February 16, 2007

/s/

RONALD D. ARENA
LITTLER MENDELSON, P.C.
Attorneys for Plaintiff
AMERICAN MEDICAL SYSTEMS, INC.

10 Dated: February 16, 2007

/s/

LOUIS A. STORROW
LAW OFFICES OF LOUIS A. STORROW
Attorneys for Defendants
ALLAN DANTO and DANTO &
ASSOCIATES

15 SO ORDERED:

16 Dated: February 23, 2007

HON. JEREMY FOGEL

JUDGE OF THE U.S. DISTRICT COURT

19 Firmwide:82051658.1 051095.1004